

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARI MELISSA MORALES,

INDICTMENT

Defendant.

_____ /

The Grand Jury charges:

(Conspiracy to Commit Wire Fraud)

On or about April 8, 2024, in Kent County, in the Southern Division of the Western District of Michigan and elsewhere, the defendant,

KARI MELISSA MORALES,

knowingly conspired and agreed with persons known and unknown to the Grand Jury to commit the offense of wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1349.

OBJECT, MEANS, AND METHODS

1. The object of the conspiracy was for the members of the conspiracy, including the defendant, KARI MELISSA MORALES, to unlawfully enrich themselves by devising a scheme to defraud an individual known to the conspirators as R.S. (whose full name is known to the Grand Jury but abbreviated herein) and to obtain money under false and fraudulent pretenses, representations, and promises.

2. It was part of the conspiracy that co-conspirators, including the defendant, KARI MELISSA MORALES, transmitted and caused to be transmitted wire communications that traveled in interstate and foreign commerce, including email and text messages, in furtherance of

the scheme to defraud.

3. It was further part of the conspiracy that:

- a. A co-conspirator sent an unsolicited text message to a cell phone number that previously was assigned to R.S., a female resident of Kent County, in the Western District of Michigan. The co-conspirator did not know that the cell phone number had been reassigned to a federal law enforcement agent in Kent County, Michigan.

The message communicated the following false and fraudulent representations:

Hello [R.S.], my name is Wayne Johnson. I am contacting you from the IRS fraud department regarding your recent tax return filing. We detected that your last tax return was inappropriate and misleading, we need to sort this out with you before handing it over to appropriate authorities. Please respond to this text message while we discuss possible solutions to avoid you being charged for fraudulent tax filing. Thank you”

- b. After the initial contact was made, a member of the conspiracy sought payment of money from R.S. to resolve the matter to avoid her arrest and federal prosecution for fraud.
- c. A member of the conspiracy falsely represented that a federal arrest warrant for R.S. had been issued in March 2024 pursuant to a federal grand jury indictment for tax fraud, and that federal agents could arrest R.S. if payment to the IRS was not made.
- d. The defendant, KARI MELISSA MORALES, a resident of Milford, Michigan, communicated with a co-conspirator (an individual she met online and known to her as “Tom,” whom she never met in person) concerning the co-conspirator’s plan to obtain money from R.S. in the scheme. MORALES agreed to help the co-conspirator obtain money from the female in Grand Rapids, Michigan.

- e. The defendant, KARI MELISSA MORALES, agreed to print out—and did print out—a digital copy of a document entitled “FBI WARRANT OF ARREST” on what was purported to be FBI letterhead that a co-conspirator sent MORALES by email. The document falsely represented that the warrant allowed law enforcement to arrest R.S. for tax fraud, punishable by up to 10 years in prison and a fine of \$95,000.
 - f. The defendant, KARI MELISSA MORALES, agreed to print out—and did print out—a digital copy of a “Receipt” dated April 8, 2024, purportedly issued by the IRS, that a co-conspirator sent MORALES by email. The receipt falsely represented that R.S. paid the IRS \$60,000 in connection with a tax refund fraud and, as a result, R.S. will not be charged for tax fraud by the IRS and other government agencies.
 - g. The defendant, KARI MELISSA MORALES, at the direction of a co-conspirator, agreed to meet a woman that the conspirators believed was R.S. in a parking lot in Grand Rapids, Michigan, in Kent County, in the Southern Division of the Western District of Michigan, to retrieve \$60,000 in cash from her in exchange for the false and fraudulent “IRS Receipt” and “FBI WARRANT OF ARREST” documents that MORALES printed out and placed in an envelope. MORALES received instruction and guidance from a co-conspirator on how and where to meet the female for the exchange. For her role in the scheme, MORALES was told by a co-conspirator that she could keep \$2,500 of the cash she obtained from the female. MORALES was to provide the remaining cash to two co-conspirators.
4. In an attempt to execute the scheme to defraud, on or about April 8, 2024, the defendant, KARI MELISSA MORALES, drove to Grand Rapids, Michigan, to exchange the fake

government documents for \$60,000 in cash. MORALES carried a loaded firearm in a holster in her waistband and brought a gold police badge that was issued to another person by a municipality in the State of Michigan and placed it on the front passenger seat of her vehicle. When MORALES met with an individual that the conspirators believed was R.S. and was handed an envelope purporting to contain cash, MORALES provided the “IRS Receipt” and “FBI WARRANT OF ARREST” and confirmed that the envelope contained the documents.

18 U.S.C. § 1349

18 U.S.C. § 1343

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



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